

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 1:21-cv-11181-PBS

INA STEINER, DAVID STEINER, and STEINER
ASSOCIATES LLC,

Plaintiffs,

v.

EBAY, INC., et al.

Defendants.

**DEFENDANT STEPHANIE POPP’S ANSWER AND AFFIRMATIVE DEFENSES TO
PLAINTIFFS’ AMENDED COMPLAINT**

NOW COMES Defendant Stephanie Popp (“Defendant Popp”) and states the following in answer to the Amended Complaint of Plaintiffs Ina Steiner, David Steiner, and Steiner Associates LLC:

INTRODUCTION

1. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
2. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
3. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
4. Denied that Defendant Popp personally received a “directive” from the named individuals. Admitted that Defendant Popp knew there was a plan relative to the Steiners, but denied that she “approved” it. Defendant Popp is without sufficient personal

knowledge or information to form a belief as to the truth of the remainder of these allegations. Further, to the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

5. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. The referenced messages speak for themselves. Defendant Popp denies delivering or participating in delivering anything to the Steiners.
6. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits traveling from California to Natick. Otherwise denied as characterized.
7. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
8. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits to posting on Twitter while other Defendants were in Natick, but denies posting the Steiners' home address at that time, denies threatening to kill the Steiners, and denies posting on Craigslist.
9. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
10. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning how the Steiners felt or actions the Steiners took. Defendant Popp admits to monitoring with a police scanner but denies the characterization as to the purpose of the monitoring. Defendant Popp further denies "prais[ing]" any other Defendant or "jok[ing]" with any other Defendant as alleged.

11. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits that a meeting with Defendant Baugh occurred, that she was directed to delete communications, and that she was aware of the creation of a dossier and a “persons of interest” file, but otherwise denies the allegations as characterized.
12. Admitted that Defendant Popp pled guilty to an Information in the U.S. District Court for the District of Massachusetts. The Information speaks for itself.
13. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
14. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
15. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph, except admitted that Defendant Popp received and carried out certain directives from other named Defendants.
16. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
17. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

18. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

JURISDICTION AND VENUE

19. Defendant Popp denies she is a citizen of California, and is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

20. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

21. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

22. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

THE PARTIES

23. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

24. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

25. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

26. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

27. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
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29. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
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31. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
32. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
33. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
34. Defendant Popp denies that she is currently serving a sentence of one year and one day in Federal Prison in Lexington, Kentucky, but admits that these allegations were accurate as of the time the Amended Complaint was filed. Defendant Popp admits that she pled guilty to two counts in the Information. Defendant Popp further admits that her title was Senior Manager of the Global Intelligence Center, but further states that while she retained that title at all relevant times, she ceased performing that role in or around the summer of 2019.
35. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

36. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

37. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

38. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

39. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

40. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits that she was in the eBay security division and that the team was a direct report to Defendant Jones. Defendant Popp denies that she personally reported to or took instruction from Defendant Jones.

41. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

THE FACTS

42. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

43. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

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66. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
67. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
68. Denied.

69. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

70. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

71. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

72. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

73. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

74. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

75. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

76. Denied as characterized, but admitted that Defendant Popp viewed the referenced sites.

77. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

78. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

79. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

80. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

81. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
82. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
83. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
84. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
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86. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
87. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
88. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
89. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
90. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph, but denies she was ever “informed” about Samoan gang members.
91. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

92. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

93. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits to meeting with certain Defendants but denies a single meeting with all of the Defendants named in this paragraph and denies the characterization of the meeting.

94. Admitted that Defendant Baugh played the referenced movie clip, but otherwise denied as characterized, and denied ever discussing sending a coffin or chainsaw to the Steiner residence.

95. Denied.

96. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Baugh shared messages from Defendant Wymer with Defendant Popp at some point in time.

97. The first sentence is denied. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.

98. Admitted that at some point Defendant Popp was instructed to send Twitter messages to the Steiners, but otherwise denied as characterized.

99. Admitted that the Twitter handle @Tui_Elei was created. Otherwise denied as characterized.

100. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp received directives from other eBay Defendants, but denied that she personally received any directives from the named Defendants.

101. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
102. Admitted.
103. Admitted that Defendant Popp created the Twitter handle @Tui_Elei and that Defendant Baugh approved the avatar image of a skull.
104. Admitted that Defendant Popp sent Tweets and Twitter messages to the Steiners. Denied that Defendant Popp drafted the Tweets or threatened to kill the Steiners. Admitted that the Defendants shared the Tweets on WhatsApp and that the Defendants used WhatsApp for internal discussions.
105. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
106. The Tweet speaks for itself.
107. The Tweet speaks for itself.
108. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
109. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

110. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
111. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
112. Admitted that Defendant Baugh shared with Defendant Popp conversations he had with Defendant Wymer. Otherwise denied.
113. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
114. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
115. Denied that Defendant Popp signed the Steiners up for emails or subscriptions.
116. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
117. The Tweet speaks for itself.
118. The Tweet speaks for itself.
119. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

120. The Tweet speaks for itself.
121. Denied that Defendant Popp ordered a fetal pig to the Steiner residence.
122. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
123. Denied that Defendant Popp ordered a Halloween mask delivered to the Steiners.
124. The Tweet speaks for itself.
125. The Tweet speaks for itself.
126. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
127. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
128. The first sentence is denied as characterized. The Tweet speaks for itself.
129. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
130. Denied that Defendant Popp sent email subscriptions or packages to the Steiners and denied that Defendant Popp threatened to kill the Steiners.
131. Admitted.
132. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

133. Denied that Defendant Popp sent any packages to the Steiners.
134. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
135. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.
136. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
137. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp met with other Defendants in Boston and discussed installing a GPS tracking device on the Steiners' vehicle. Otherwise denied.
138. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
139. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
140. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

141. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph, except that the last sentence is denied as characterized.
142. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
143. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
144. Admitted that Defendant Popp posted Tweets and sent messages, but denied that Defendant Popp sent packages to the Steiners.
145. Denied as to Defendant Popp.
146. Denied as to Defendant Popp.
147. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
148. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
149. The first sentence is admitted. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.

150. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
151. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
152. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
153. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
154. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
155. To the extent this paragraph refers to Defendant Popp, admitted that, on one occasions, she was in a rented vehicle with Defendant Baugh and followed David Steiner for a few blocks, but otherwise denied as characterized. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second clause of the second sentence, and the third sentence.
156. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

157. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
158. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
159. Denied that Defendant Popp sent any deliveries to the Steiners. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.
160. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp posted Tweets and sent messages to the Steiners. Denied that Defendant Popp sent packages to the Steiners, attempted to break into their home, or attached a GPS to their car.
161. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
162. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. The first, second, and third sentences are denied as to Defendant Popp. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the remainder of the allegations in this paragraph.
163. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

164. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
165. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
166. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
167. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
168. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
169. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
170. Admitted that at some point in August 2019, Defendant Popp circled the block at least once and parked at the end of the Steiners' street, but denied that she was "await[ing] David Steiner's departure." Denied that Defendant Zea was present.

171. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
172. Admitted Defendant Popp participated in following David Steiner. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.
173. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
174. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
175. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
176. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
177. Denied as to Defendant Popp.
178. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

179. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
180. Admitted that Defendant Popp received a movie clip from Defendant Baugh. The second sentence is denied.
181. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
182. Denied as to Defendant Popp.
183. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
184. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.
185. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
186. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
187. Defendant Popp admits to publicly posting a screenshot from a third-party website showing the Steiners' home address and sending a message to the Steiners. The posts and Tweet speak for themselves. Defendant Popp is otherwise without sufficient

personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

188. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

189. Admitted that Defendant Popp noticed a Jeep and thought it was a detective.

190. To the extent this paragraph implies all the named Defendants were part of a single WhatsApp group, denied. The messages speak for themselves. The second sentence and the last sentence are denied.

191. Denied as to Defendant Popp.

192. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

193. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

194. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

195. Defendant Popp is without sufficient personal knowledge or information to form a belief as to whether, when, or why the Steiners contacted the NPD. Admitted that Defendant Popp created additional Twitter handles impersonating eBay sellers at the direction of other Defendants, and admitted that the avatars were a pig and a skull mask.

196. The first and second sentences are admitted. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the third and fourth sentences.
197. The first and second sentences are admitted. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in third sentence.
198. Admitted that Defendant Popp posted the response.
199. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp created the accounts. Otherwise denied as characterized.
200. The first sentence is admitted. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in second sentence.
201. Admitted.
202. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp engaged in discussions over eBay corporate email. Otherwise denied as characterized.
203. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Denied as to Defendant Popp's intent.
204. Defendant Popp admits to sending Twitter messages to the Steiners. Otherwise denied as characterized.
205. Denied as to Defendant Popp.

206. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

207. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

208. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp hid her identity online but made known she was aware of the Steiners' address. Denied that Defendant Popp indicated she would attack the Steiners' home. Denied that Defendant Popp personally received direction from the named Defendants. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

209. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

210. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Denied that Defendant Popp personally received direction from the named Defendants. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

211. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

212. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
213. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
214. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
215. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
216. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
217. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
218. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

219. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
220. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
221. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
222. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
223. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp admits being aware of the NPD investigation but is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
224. Defendant Popp is without sufficient personal knowledge or information to form a belief as to Gilbert's admissions. The messages speak for themselves.
225. Denied.
226. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

227. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.
228. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.
229. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.
230. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
231. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
232. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
233. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
234. Admitted.
235. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

236. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
237. Admitted that Defendant Popp emailed Defendant Gilbert a Bay Area POI report.
238. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
239. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
240. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
241. The first sentence of this paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of the allegations therein. Admitted that Defendant Popp received WhatsApp messages from Defendant Baugh, but otherwise denied as characterized.
242. Admitted that Defendant Popp received the WhatsApp messages. The messages speak for themselves.
243. Admitted that Defendant Popp received the WhatsApp messages. The messages speak for themselves.
244. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

245. Denied as characterized.

246. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

247. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

248. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

249. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

250. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

251. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

252. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

253. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

254. Admitted that Defendant Popp received WhatsApp messages from Defendant Gilbert. The messages speak for themselves. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the last sentence.

255. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

256. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

257. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

258. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

259. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

260. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

261. Defendant Popp admits to sending messages from the identified account. The messages speak for themselves. Otherwise denied as characterized.

262. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

263. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

264. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

265. Admitted that Defendant Popp received messages from Defendant Gilbert. The messages speak for themselves.

266. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

267. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

268. Admitted that Defendant Popp stopped posting on the Twitter accounts. Denied that Defendant Popp had any accounts registered with the EcommerceBytes newsletter. Otherwise denied as characterized.

269. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

270. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

271. Admitted that Defendant Popp met with the named individuals. Otherwise denied as characterized.

272. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

273. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Admitted that Defendant Popp received this direction from Defendant Baugh.

274. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

275. Admitted that the call was on speakerphone. Otherwise denied as characterized.

276. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
277. Admitted that the interview was conducted over the phone and that the other named individuals listened in. Otherwise denied as characterized.
278. Admitted.
279. Admitted that Defendant Popp was directed by Defendant Baugh to sit in on the Stockwell and Zea interviews.
280. Admitted that Defendant Popp was present at the Stockwell and Zea interviews. Otherwise denied as characterized.
281. Admitted that Defendant Popp was placed on administrative leave. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.
282. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
283. Admitted that Defendant Popp posted the Tweets. Otherwise denied as characterized.
284. The first sentence is admitted as to Defendant Popp. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.
285. Admitted that Defendant Popp went to Defendant Baugh's house. Otherwise denied as characterized.

286. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
287. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
288. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
289. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
290. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
291. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
292. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

293. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
294. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
295. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
296. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
297. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
298. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
299. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

300. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
301. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
302. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
303. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
304. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
305. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
306. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

307. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
308. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
309. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
310. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
311. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
312. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
313. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

314. Admitted that, as an eBay employee, Defendant Popp was required to fulfill company directives. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

315. Admitted Defendant Baugh orchestrated active shooter drills, but otherwise denied as characterized. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the last sentence.

316. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

317. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

318. The first sentence is denied. Admitted that Defendant Baugh discovered a knife onsite, but denied as to its alleged location. Otherwise denied as characterized.

319. Admitted that Defendant Baugh played movie clips at meetings. Defendant Popp is without sufficient personal knowledge or information to form a belief as to Baugh's intent. Admitted that Baugh played clips from "American Gangster," "Wolf of Wall Street," and "Meet the Fockers," but Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

320. Admitted that, on one occasion, Defendant Baugh put employees' belongings in a plastic bag, but otherwise denied as characterized.

321. Admitted that Defendant Baugh had a video of Defendant Zea falling off a stool, but Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to Baugh's intent or the truth of the allegations in this paragraph.
322. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
323. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
324. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
325. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
326. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
327. Admitted that there was a culture of drinking at eBay, but Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.
328. Admitted that analysts, including Defendant Popp, were occasionally asked by Defendant Baugh to work late, but otherwise denied as characterized. Defendant Popp is

without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.

329. Denied that Defendant Baugh ever “force[d]” Defendant Popp to go out to dinner.

Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

330. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

331. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

332. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

333. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

334. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

335. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

336. Admitted that Defendant Baugh kept in touch with Defendant Popp, but otherwise denied as characterized. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence.

337. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

338. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

339. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

340. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

341. Admitted that Defendant Popp occasionally participated in informing Concentric Advisors that the services of Concentric Advisors analysts were no longer needed, but otherwise denied as characterized as to Defendant Popp.

342. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the first sentence. Admitted that Florence spoke to Defendant Popp about firing analysts. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the third sentence.

343. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

344. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

345. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

346. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

347. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

348. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

349. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

350. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

351. The first sentence is denied as to Defendant Popp. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence. The third sentence is denied as to Defendant Popp.

352. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

353. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

354. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

355. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

356. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

357. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

358. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

359. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

360. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

361. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

362. Admitted that Defendant Popp pled guilty to two offenses, but otherwise denied as characterized.

363. Admitted. The Information speaks for itself.

364. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

365. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

366. Admitted that Defendant Popp pled guilty to two counts of conspiracy. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in the second sentence. The statutory sentencing provisions speak for themselves. The plea hearings and the plea agreements speak for themselves.

367. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

368. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

369. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

370. Admitted that Defendant Popp was sentenced as alleged. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

371. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

372. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

373. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

374. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

375. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

376. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

377. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

378. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

379. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge

or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

380. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

381. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

382. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

383. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

384. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

385. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

386. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

387. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

388. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

389. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

390. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

391. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph and denies them as characterized.

392. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

393. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
394. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
395. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
396. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
397. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
398. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
399. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.
400. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

401. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

402. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

403. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

404. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied.

405. This paragraph does not pertain to Defendant Popp and she is thus without sufficient personal knowledge or information to form a belief as to the truth of these allegations.

CAUSES OF ACTION

COUNT I: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

406. Defendant Popp repeats and realleges her above answers.

407. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

408. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning what the Steiners believed.

409. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

410. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' distress.

411. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Othewise denied as to Defendant Popp's intent.

412. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

413. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

414. This paragraph does not pertain to Defendant Popp and no answer is required.

415. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is otherwise without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

416. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning what the Steiners experienced.

417. This paragraph does not pertain to Defendant Popp and no answer is required.

418. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

COUNT II: STALKING

419. This count was dismissed. No answer is required.

420. This count was dismissed. No answer is required.

- 421. This count was dismissed. No answer is required.
- 422. This count was dismissed. No answer is required.
- 423. This count was dismissed. No answer is required.
- 424. This count was dismissed. No answer is required.
- 425. This count was dismissed. No answer is required.
- 426. This count was dismissed. No answer is required.
- 427. This count was dismissed. No answer is required.
- 428. This count was dismissed. No answer is required.
- 429. This count was dismissed. No answer is required.
- 430. This count was dismissed. No answer is required.

COUNT III: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- 431. Defendant Popp repeats and realleges her above answers.
- 432. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' emotional distress.
- 433. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' physical and emotional distress.
- 434. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

435. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

436. This paragraph does not pertain to Defendant Popp and no answer is required.

437. This paragraph does not pertain to Defendant Popp and no answer is required.

438. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

COUNT IV: NEGLIGENCE

439. Defendant Popp repeats and realleges her above answers.

440. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

441. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

442. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages.

443. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

444. This paragraph does not pertain to Defendant Popp and no answer is required.

COUNT V: NEGLIGENT HIRING

445. This count was dismissed. No answer is required.

446. This count was dismissed. No answer is required.

447. This count was dismissed. No answer is required.

448. This count was dismissed. No answer is required.

449. This count was dismissed. No answer is required.

450. This count was dismissed. No answer is required.

451. This count was dismissed. No answer is required.

452. This count was dismissed. No answer is required.

453. This count was dismissed. No answer is required.

COUNT VI: NEGLIGENT SUPERVISION

454. This count does not pertain to Defendant Popp. No answer is required.

455. This count does not pertain to Defendant Popp. No answer is required.

456. This count does not pertain to Defendant Popp. No answer is required.

457. This count does not pertain to Defendant Popp. No answer is required.

458. This count does not pertain to Defendant Popp. No answer is required.

459. This count does not pertain to Defendant Popp. No answer is required.

460. This count does not pertain to Defendant Popp. No answer is required.

461. This count does not pertain to Defendant Popp. No answer is required.

462. This count does not pertain to Defendant Popp. No answer is required.

463. This count does not pertain to Defendant Popp. No answer is required.

464. This count does not pertain to Defendant Popp. No answer is required.

465. This count does not pertain to Defendant Popp. No answer is required.

466. This count does not pertain to Defendant Popp. No answer is required.

467. This count does not pertain to Defendant Popp. No answer is required.

468. This count does not pertain to Defendant Popp. No answer is required.

469. This count does not pertain to Defendant Popp. No answer is required.

470. This count does not pertain to Defendant Popp. No answer is required.

471. This count does not pertain to Defendant Popp. No answer is required.

COUNT VII: NEGLIGENT RETENTION

472. This count does not pertain to Defendant Popp. No answer is required.

473. This count does not pertain to Defendant Popp. No answer is required.

474. This count does not pertain to Defendant Popp. No answer is required.

475. This count does not pertain to Defendant Popp. No answer is required.

476. This count does not pertain to Defendant Popp. No answer is required.

477. This count does not pertain to Defendant Popp. No answer is required.

478. This count does not pertain to Defendant Popp. No answer is required.

479. This count does not pertain to Defendant Popp. No answer is required.

480. This count does not pertain to Defendant Popp. No answer is required.

481. This count does not pertain to Defendant Popp. No answer is required.

482. This count does not pertain to Defendant Popp. No answer is required.

COUNT VIII: ASSAULT

483. This count was dismissed. No answer is required.

484. This count was dismissed. No answer is required.

485. This count was dismissed. No answer is required.

486. This count was dismissed. No answer is required.

487. This count was dismissed. No answer is required.

488. This count was dismissed. No answer is required.

489. This count was dismissed. No answer is required.

490. This count was dismissed. No answer is required.

491. This count was dismissed. No answer is required.

COUNT IX: VIOLATION OF TITLE II, Ch. 12, § 11 (MASSACHUSETTS CIVIL RIGHTS ACT VIOLATION)

492. Defendant Popp repeats and realleges her above answers.

493. This paragraph does not pertain to Defendant Popp and no answer is required.

494. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.

495. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

496. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

497. This paragraph does not pertain to Defendant Popp and no answer is required.

498. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages.

COUNT X: DEFAMATION

499. Defendant Popp repeats and realleges her above answers.

500. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

501. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

502. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

503. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
504. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
505. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
506. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
507. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
508. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
509. Denied as characterized.
510. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
511. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
512. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.
513. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.
514. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

515. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph concerning the Steiners' business.

516. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

517. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

518. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.

519. This paragraph does not pertain to Defendant Popp and no answer is required.

520. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

521. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

522. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

COUNT XI: TRESPASS (PHYSICAL AND TRESPASS TO CHATTELS)

523. Defendant Popp repeats and realleges her above answers.

524. Denied as to Defendant Popp.

525. Denied as to Defendant Popp.

526. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages, but otherwise denied as to Defendant Popp.

527. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

528. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' "emotional turmoil."

529. This paragraph does not pertain to Defendant Popp and no answer is required.

530. This paragraph repeats Paragraph 527. No answer is required.

531. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages.

COUNT XII: FALSE IMPRISONMENT

532. Defendant Popp repeats and realleges her above answers.

533. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

534. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages, but otherwise denied as to Defendant Popp.

535. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

536. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

537. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

538. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

539. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

540. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as to Defendant Popp.

541. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations in this paragraph.

542. This paragraph does not pertain to Defendant Popp and no answer is required.

543. Denied as to Defendant Popp's liability.

544. This paragraph does not pertain to Defendant Popp and no answer is required.

COUNT XIII: CIVIL CONSPIRACY

545. Defendant Popp repeats and realleges her above answers.

546. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.

547. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.

548. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required. Otherwise denied as characterized.

549. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

550. Admitted that Defendant Popp acted solely at the direction and encouragement of other Defendants. Otherwise denied.

551. Admitted that Defendant Popp acted solely at the direction and encouragement of other Defendants. Otherwise denied.

552. This paragraph does not pertain to Defendant Popp and no answer is required.

553. This paragraph does not pertain to Defendant Popp and no answer is required.

554. To the extent this paragraph contains legal arguments and/or conclusions, no answer is required.

555. Defendant Popp is without sufficient personal knowledge or information to form a belief as to the truth of the allegations concerning the Steiners' damages.

COUNT XIV: RATIFICATION

556. This count does not pertain to Defendant Popp and no answer is required.

557. This count does not pertain to Defendant Popp and no answer is required.

558. This count does not pertain to Defendant Popp and no answer is required.

559. This count does not pertain to Defendant Popp and no answer is required.

560. This count does not pertain to Defendant Popp and no answer is required.

561. This count does not pertain to Defendant Popp and no answer is required.

562. This count does not pertain to Defendant Popp and no answer is required.

563. This count does not pertain to Defendant Popp and no answer is required.

564. This count does not pertain to Defendant Popp and no answer is required.

565. This count does not pertain to Defendant Popp and no answer is required.

566. This count does not pertain to Defendant Popp and no answer is required.

567. This count does not pertain to Defendant Popp and no answer is required.

568. This count does not pertain to Defendant Popp and no answer is required.
569. This count does not pertain to Defendant Popp and no answer is required.
570. This count does not pertain to Defendant Popp and no answer is required.
571. This count does not pertain to Defendant Popp and no answer is required.
572. This count does not pertain to Defendant Popp and no answer is required.

AFFIRMATIVE DEFENSES

Defendant Popp, having denied each and every allegation not admitted above, states her affirmative defenses as follows:

Failure to State a Claim

The Amended Complaint fails to state claims upon which relief can be granted.

PRAYER FOR RELIEF

WHEREFORE, Defendant Popp requests that the Court dismiss with prejudice all claims in the Amended Complaint that lack a factual or legal basis; deny any and all relief requested by the Plaintiffs that is not authorized by law; and grant such further relief as justice may require.

Respectfully submitted,

STEPHANIE POPP,

By her attorneys,



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Dated: January 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2024, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 12, 2024



Alexandra H. Deal